



# CARPENTERS UNION LOCAL 217 SAN MATEO COUNTY

1153 CHESS DRIVE • SUITE 100 • FOSTER CITY, CALIFORNIA 94404-1197 • (650) 377-0217

## By Email

May 25, 2023

City of Brisbane  
Community Development Department  
Attn: John Swiecki, AICP, Community Development Director  
50 Park Place, Brisbane, CA 94005  
E-mail: [baylands@brisbaneca.org](mailto:baylands@brisbaneca.org)

**Re: Revised Baylands Specific Plan Notice of EIR Preparation**

Dear Mr. John Swiecki,

The members and officers of Carpenters Union Local 217 (“Local 217”) appreciate the opportunity to comment regarding the Notice of Preparation of an Environmental Impact Report for the Brisbane Baylands Specific Plan.

Our members have a direct interest in securing high-road job opportunities and investment in their local communities. Indeed, Local 217 is proud to count many Brisbane residents among its membership ranks, including those who live and/or work in the vicinity of the project. This transformational project will create sustainable work for our members, whose skills will contribute towards robust, interconnected development.

The proposed project, if guided with proper guardrails, contains tremendous economic opportunities for the City of Brisbane. To maximize the benefits to the local community while mitigating environmental harms, Local 217 strongly advocates that **future construction activity related to this development comply with local hire and responsible bidder requirements** that should be incorporated in the City’s EIR.

Local 217 intends to participate in the CEQA process and beyond to ensure that the City complies with CEQA’s mandate to minimize the proposed project’s avoidable environmental impacts while maximizing benefits for the community and skilled trades workers. In particular, Local 217 requests that the City analyze all impacts required by CEQA, including, but not limited to, the following:

- Emission Impacts resulting from construction-related employment
- Environmental impacts on the proposed project’s construction workers

## 1. Emission impacts resulting from construction-related employment

The Notice of Preparation (NOP) identifies “The Project would generate substantial greenhouse gas emissions as the result of construction, demolition, and operations.” To account for this, the EIR should analyze how employers will manage and mitigate the environmental impact of the construction workforce’s commuting patterns.. One way to meet this objective is to introduce a *local hire policy* for construction activity associated with the proposed project.

A local employment preference requirement for construction activity linked to the proposed project will *reduce vehicle emissions* from worker commutes to and from project sites, while providing economic benefits to workers from the local community. Unfortunately, Local 217 is aware that many projects in San Mateo have been constructed by low-wage, out-of-area workers. This compromises meaningful training opportunities for the local community’s future construction workforce, while also unnecessarily increasing inbound transportation emissions into the community.

The scope of the City’s eventual EIR should compare the economic and environmental impacts of the proposed project with and without legal measures that encourage a local hiring preference, commit to utilizing local apprentices, or demonstrate other mechanisms that increase the likelihood of hiring workers from the local community. Doing so ensures economically beneficial local employment and training for skilled craft workers, while upholding the City of Brisbane’s environmental goals.

## 2. Environmental Impacts on the proposed project’s construction workers

The proposed project will likely necessitate mitigation steps to mitigate the construction workforce’s exposure to hazards and hazardous materials. The NOP identifies the presence of hazards and hazardous materials as one environmental impact area within the EIR.

Hazards that prevent a safe jobsite, impose a clear burden on taxpayers when factoring in injury-related calls for funds from the State’s workers’ compensation system. Recent research cited by the Department of Labor has advocated for **responsible bidder provisions** as an “insurance” policy for taxpayers. This same research demonstrates that construction projects with responsible contractors were 19% less likely to have OSHA violations when compared to projects that failed to require responsible contractors.

A lack of a clear policy on these issues jeopardizes the City’s ability to enforce adherence to the entire EIR. To facilitate the necessary cooperation between the City and contractors regarding worker exposure to environmental hazards, having clear provisions for responsible contractors are necessary.

## Conclusion

Local 217 hopes that the City uses the CEQA process to minimize the proposed project's negative environmental impacts while maximizing the economic benefits presented to the City, workers, and region. We look forward to reviewing the Draft Environmental Impact Report, including its acknowledgement of the issues we have raised in this letter.

Sincerely,



Edward Evans  
Senior Field Representative  
Carpenters Local 217

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OPEIU:29/afl-cio

